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May 19, 2005

Stephen L. Johnson, Administrator
US Environmental Protection Agency
Ariel Rios Building #1101-A
1200 Pennsylvania Avenue, NW
Washington, DC 20460

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Subject: Comments on the HPV test plan for Triglycidyl isocyanurate

Dear Administrator Johnson:

The following comments on the Huntsman-Nissan-TGIC Consortium's test plan for the chemical triglycidyl isocyanurate are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

The TGIC Consortium submitted its test plan on Dec. 27, 2004 for Triglycidyl isocyanurate (CAS No. 2451-62-9), also known as TGIC. This chemical is an epoxide resin used in polyester-based powder coatings. The Consortium has submitted a comprehensive analysis of TGIC by compiling existing data from a variety of sources to fulfill almost all SIDS endpoints. A separate developmental toxicity study was not located but there is no evidence that TGIC would be teratogenic. A 13-week fertility study with male rats showed no effects on reproductive parameters nor did data from the two-year chronic toxicity study, also with male rats. These data, in conjunction with the histopathology of female reproductive organs from the 19-day repeated dose study were used to address the SIDS endpoint for developmental toxicity.

Moreover, adequate measures to protect workers from occupational exposure have already been established. The TLV for TGIC is 0.05 mg/m³. Additional animal studies will not likely change the potential for exposure, which is already minimal.

This approach demonstrates a thoughtful analysis by the Huntsman-Nissan-TGIC Consortium and adheres to animal welfare principles outlined in EPA's October 1999 letter as well as the December 2000 *Federal Register* notice, stating that HPV participants "*may conclude that there is sufficient data, given the totality of what is known about a chemical, including human experience, that certain endpoints need not be tested. As with all chemicals, before generating new information, participants should further consider whether any additional information obtained would be useful or relevant.*"

We commend the sponsor on a well-written, thorough test plan for TGIC. Thank you for your attention to these comments. I may be reached at 202-686-2210, ext. 327, or via e-mail at meven@pcrm.org.

Sincerely,

Megha Even, M.S.
Research Analyst

Chad B. Sandusky, Ph.D.
Director of Toxicology & Research